

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF TEXAS  
TYLER DIVISION

JOSE GONZALEZ, §  
§  
Plaintiff, § CAUSE OF ACTION:  
§  
v. §  
§ JURY TRIAL REQUESTED  
BOBBY LUMPKIN; WARDEN JAMES § Civil Action No. 6:21-cv-00351  
BOWMAN; RICHARD MINTON; §  
ROBERT COUSINS; CHRISTOPHER §  
JAYNES; CECIL HASTINGS; and §  
OFFICER PATRICK SHUMATE, §  
§  
Defendants. §

**NOTICE OF JOINT PROPOSED SCHEDULING ORDER**

The parties respectfully submit the attached proposed scheduling order, which the parties have agreed to.

The parties have proposed dates in italicized text where they believe those dates would be more appropriate than the default dates in the District Court's form order. In particular, the parties request that the expert deadline be close to the end of the discovery period so that the experts can consider a mostly developed factual record, and that the mediation deadline be later in the process as the parties anticipate a higher likelihood of success at that time.

The parties respectfully request that the Court enter the attached order.

Dated: November 19, 2021.

Respectfully submitted,

By: /s/ Jeff Edwards  
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**ATTORNEYS FOR DEFENDANTS**

**CERTIFICATE OF SERVICE**

By my signature above, I certify that a true and correct copy of the foregoing has been served on all counsel of record through the Electronic Case Files System of the Eastern District of Texas.

By /s/ Jeff Edwards  
JEFF EDWARDS